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March 05, 1999

PEDERAL COMMUNICATIONS COMMISSIONS
COFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington D.C. 20455

Re:

Ex Parte Filing

CC Docket No. 96-115

Dear Ms.Salas:

My name is Sal Gonzalez. I am President of The Little Yellow Pages, an independent directory publisher in the Southern California area. I compete with the directory-publishing affiliates of Pacific Bell and GTE Directories. The Little Yellow Pages offers lower advertising rates than the telephone company-affiliated directories. In addition, The Little Yellow Pages offers a unique product and service to consumers. We specialize in community directories that include the complete data base of the area's we serve (Purchased from the Local Carrier at a very high price) plus special features, like community pages that give information that is unique to these communities.

I have been involved in the yellow pages and directory publishing industry for almost three decades. Nearly half of that time, I spent with various Bell System companies, such as BellSouth, NYNEX, and Southwestern Bell. At these companies, I was employed in a number of positions, ranging from Sales Consultant to District Manager. In these positions, one of my duties included assisting in the development of Subscriber List Information("SLI"). As result, I have first-hand experience with how telephone companies handle and process subscriber list information.

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The purpose of this letter is to provide the Commission with information about the ability of telephone companies to provide listing updates to directory publishers.

Because the incumbent local exchange telephone companies must maintain databases containing the names, addresses, and telephone numbers of their subscribers in order to provide local exchange service, they have complete control over the basic information utilized in telephone directories as a necessary by-product of being in the telephone business.

Each year, there is up to a 40% change in the information in the telephone companies' databases. This change is made up of new growth, people moving in and moving out, and businesses changing or leaving. The telephone companies typically record these data within their databases on a daily basis. These data are typically maintained in mainframe computers on database programs that hold the data in coded fields to enable extraction of data selected by criteria such as geographic area, telephone number, or date of entry into the database.

Directory publishers need listing updates in order to deliver directories to new telephone subscribers and to solicit advertising from new businesses. In addition, directory publishers need listing updates in order to keep their databases accurate and up-to-date. Otherwise, directory publishers are forced needlessly to repurchase the same listings over and over in order to update their listing files.

The cost to the telephone company to extract listing updates from its database for a given period of time, such as on a daily, weekly, or monthly basis, is negligible. Each extraction simply involves entering the appropriate command that will direct the computer to perform the task required. Similarly, in order to extract a complete set of listings for a particular geographic area, i.e., the base file, the same procedure is followed except that fewer limitations are included in the extraction command. Hence, the cost of extracting listing updates does not differ significantly from the cost of extracting initial listings.





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Telephone companies' subscriber databases are managed by sophisticated computers and computer software. Unless the technology employed by the telephone companies has become less advanced since I worked for these companies, the same capability exists today to extract listing updates at very little cost to the telephone company.

Pursuant to the Commission's rules, one copy of this letter is being filed at the Commission. Should you have any questions regarding this filing, please do not hesitate to contact me at (909) 734-0201, ext. 140.

Sincerety,

Sal Gonzalez

CC: Kyle D. Dixon
Paul Gallant
William Kehoe III
Linda Kinney
Kevin J. Martin
Thomas C. Power
Lawrence E. Strickling